

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

2016 DEC 13 PM 3:24

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KENNETH J. JACOBSEN,

Defendant.

**S E A L E D**

4:16CR 3141

INDICTMENT

18 U.S.C. § 2251(a)

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252(a)(4)(B)

The Grand Jury charges that

COUNT I

On or about February 8, 2014, in the District of Nebraska, KENNETH J. JACOBSEN, the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce any minor, to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, and such visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a).

COUNT II

On or about August 9, 2014, in the District of Nebraska, KENNETH J. JACOBSEN, the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce any minor, to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, and such visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a).

COUNT III

On or about October 4, 2015, in the District of Nebraska, KENNETH J. JACOBSEN, the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce any minor, to

engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, and such visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a).

COUNT IV

From on or about January 1, 2014, and continuing to on or about December 9, 2016, in the District of Nebraska, the defendant, KENNETH J. JACOBSEN, did knowingly receive and distribute, and attempt to receive and distribute, any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and any material that contains child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT V

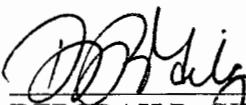
On or about December 9, 2016, in the District of Nebraska, KENNETH J. JACOBSEN, the defendant herein, did knowingly possess and access with intent to view at least one matter which contains an image of child pornography, as defined by Title 18, United States Code, Section 2256(8)(A), that had been mailed, had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign

commerce, including by computer, including images of child pornography, involving prepubescent minors or minors who had not attained 12 years of age.

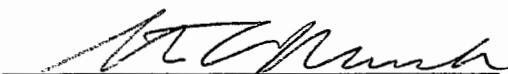
All in violation of Title 18 United States Code Section 2252(a)(4)(B).

A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
DEBORAH R. GILG  
United States Attorney  
District of Nebraska

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

  
\_\_\_\_\_  
STEVEN A. RUSSELL  
Assistant United States Attorney